

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 24-cr-20674

v.

Hon. Gershwin A. Drain

Darnell Danner,

Defendant.

_____ /

**Ex Parte Motion for Leave to File Supporting
Medical Records Exhibit Under Seal**

Darnell Danner, through counsel, moves this Court for leave to file under seal one supporting exhibit to his sentencing memorandum.

Documents used in criminal proceedings “may be closed to the public without violating the First Amendment only if three substantive requirements are satisfied: (1) closure serves a compelling interest; (2) there is a substantial probability that, in the absence of closure, this compelling interest would be harmed; and (3) the closure is narrowly tailored to protect the compelling interest.” *United States v. Nallani*, No. 11-cr-20365, 2016 WL 4138227 (E.D. Mich. Aug. 3, 2016) (omitting citations).

Defense counsel seeks to file under seal Mr. Danner’s supporting exhibit of medical records because it will contain sensitive information about

Mr. Danner's psychological and psychiatric health. This is a compelling reason that is narrowly tailored to this portion of Mr. Danner's case. While some of the information regarding his medical history will be discussed in the publicly filed sentencing memorandum, that information will be extracted from reports that could expose other private medical information and details to unneeded disclosure.

Allowing for these documents to be filed under seal as one exhibit will also provide the Court information in its decision making for sentencing.

Submitted,

/s/ Fabián Rentería Franco

Fabián Rentería Franco

Counsel for Darnell Danner

FEDERAL COMMUNITY DEFENDER

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Dated: July 27, 2025

Certificate of Service

I certify that on July 27, 2025, I filed

**Ex Parte Motion for Leave to File Supporting Medical Records
Exhibit Under Seal**

through the court's CM/ECF docketing system, which should send notice to opposing counsel of record a copy via electronic mail.

/s/ Fabián Rentería Franco
Fabián Rentería Franco